

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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FELICIA ALTERESCU,

Plaintiff,

-against-

**DECLARATION OF
PAUL K. BROWN**

Case No. 21-CV-00925-KPF

NEW YORK CITY DEPARTMENT OF
EDUCATION; RICHARD CARRANZA,
CHANCELLOR; and THE UNITED
FEDERATION OF TEACHERS

Defendants.

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PAUL K. BROWN, an attorney admitted to practice before the Court of the State of New York and before this Court, pursuant to 28 U.S.C. § 1746, declares under penalty of perjury that the following is true and correct:

1. I am associated with the law firm Archer, Byington, Glennon & Levine, LLP, attorneys for Defendant United Federation of Teachers (“UFT” or the “Union”) in the above-captioned action brought by Felicia Alterescu (“Alterescu”).

2. In support of the UFT’s motion to dismiss, attached hereto are true and correct copies of the following public documents, filed in connection with the state court proceedings in this action or referenced and incorporated by reference in the Complaint:

Exhibit “A.” (*Matter of Alterescu v Department of Educ. of the City Sch. Dist. of the City of N.Y.*, 2019 NY Slip Op 30476(U), Index No. 653007/2018 (Sup. Ct. NY Cty. February 25, 2019)) (dismissing Alterescu’s Article 75 proceeding) (Compl., ¶ 33).

Exhibit “B.” (UFT’s Notice of Appearance and Demand for Complaint filed in this action on January 25, 2021 in Supreme Court, New York County, Index No. 160168/2020).

Dated: New York, New York
October 6, 2021

/s/ Paul K. Brown

Paul K. Brown